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VIA ECF

APPLICATION GRANTED SO ORDERED A SOURCE VERNON S. BRODERICK U.S.D.J. 7/8/2021

The Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: Paguada v. Ratio Clothing, LLC, Case No. 1:21-cv-00145-VSB

Dear Judge Broderick:

We represent defendant Ratio Clothing, LLC ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, Dilenia Paguada, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from July 7, 2021 to August 23, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub
Timothy J. Straub

cc: All counsel of record (by ECF)